



CITY OF SANTA MARIA
UTILITIES DEPARTMENT
Business Services • Fleet Services
Flood Control • Regulatory Compliance
Solid Waste Services
Water Resources • Wastewater Resources

2065 EAST MAIN STREET • SANTA MARIA, CALIFORNIA 93454-8026 • 805-925-0951, EXT. 7270 • FAX 805-928-7240

May 22, 2009

Ms. Mary Adams
Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

**SUBJECT: PROPOSED REVISIONS TO THE 303(d) LIST OF IMPAIRED WATER BODIES
AND CONSIDERATION OF AN INTEGRATED ASSESSMENT REPORT FOR
THE CENTRAL COAST REGION**

Dear Ms. Adams:

The City of Santa Maria appreciates the opportunity to provide comments to Regional Water Quality Control Board staff on the Proposed Revisions to the 303(d) List of Impaired Water Bodies and Consideration of an Integrated Assessment Report for the Central Coast Region. The City values the efforts of the Regional Board to provide changes to the Clean Water Act Section 303(d) List of Impaired Waterbodies and provide accurate, updated information for the draft Clean Water Act Section 305(b) report on water quality condition of waters within the Central Coast Region.

The City here submits its comments on three primary concerns related to this project:

1. Designation of the Blosser, Bradley, and West Main Street Channels as water bodies;
2. Beneficial Uses assigned to the channels and the Santa Maria River; and
3. Sanitary Sewer Overflows as a source of impairment.

**DESIGNATION OF BLOSSER, BRADLEY, AND WEST MAIN STREET CHANNELS AS
WATER BODIES**

Two concrete-lined flood control channels, the Blosser and Bradley, and one unlined roadside ditch, the West Main Street Channel, which are all owned and operated by Santa Barbara County Flood Control and Water Conservation District, have been mistakenly referred to as natural water bodies. All of these channels are straight, engineered drainages designed to convey storm flows from the City of Santa Maria and adjacent agricultural areas. They were constructed upland for the specific purpose of flood control; no historic, relic water courses or waters of the State were involved in their designs.

Secondarily, in both wet and dry weather, they receive heavy agricultural tail flows from farm fields surrounding the City. They were not designed for this purpose, but are the recipient of the agricultural runoff due to gravity flow.

BENEFICIAL USES ASSIGNED TO THE CHANNELS AND THE SANTA MARIA RIVER

Flood Control Channels

The definition of the Blosser, Bradley, and West Main Street Channels as Surface Water Bodies is inaccurate and problematic. It is our understanding that within the Basin Plan, if a water course is defined as a Surface Water Body within the Region, but does not have specific Beneficial Uses designated to it, it is automatically assigned designations of 1)

Municipal and Domestic Water Supply; and 2) Protection of both recreation and aquatic life. These uses have no relevance to these channels. These channels are in some sections very steep and inaccessible. They function much like an extension of the City's curb and gutter systems that direct storm water flows on City streets. They were never designed for water supply, recreation, or to support aquatic life. Such uses would be highly inappropriate. These flood control channels should be removed from the listed water bodies in the Basin Plan and should have no related Beneficial Uses assigned to them.

Santa Maria River

The Santa Maria River is an appropriately listed water body assigned thirteen beneficial uses under the Basin Plan. Most of these are fitting designations, but some are not and should be deleted.

Included among the thirteen Beneficial Uses assigned to the Santa Maria River are Municipal and Domestic Supply and Contact Water Recreation. The Santa Maria River is not drawn upon for municipal water supply, nor is the River used for Contact Water Recreation. It is dry for most of the year. Any flow that may result from heavy storm events is swift and treacherous. The River is bordered on the City-side by a protective levee and prohibited from human access

The River does recharge groundwater, which the City resources from municipal wells approximately five to six miles south of the River. The City agrees that Ground Water Recharge is an appropriate Beneficial Use designation for the River. Municipal and Domestic Supply and Contact Water Recreation are not. These two Beneficial Uses should be deleted from those assigned to the Santa Maria River

SANITARY SEWER OVERFLOWS AS A SOURCE OF IMPAIRMENT

The City is particularly interested in the inclusion of sanitary sewer overflows (SSO) in the discussion of pollutant sources. The City has had several SSOs documented through CIWQS, California's on-line SSO reporting site. As documented in CIWQS, all of the overflows were fully captured by City staff and discharged at the City's wastewater treatment plant. The potential contribution of fully captured, infrequent releases from sanitary sewers is inconsequential compared to the regular releases of nutrients and pathogens from other potential sources.

The sources of nutrients and pathogens are widespread, and include both natural and anthropogenic processes. The Regional Board has not clarified to the City's satisfaction what the actual sources contributing to water impairments may be, or what may be the relative contribution of each possible source.

In addition, sanitary systems have recently been subject to new regulations that aim to reduce the likelihood of future SSOs. Improved operation and maintenance, repairs, and documentation are expected to substantially reduce the frequency of SSOs. These regulations are new, and need time to take effect. Extra requirements on municipal sewer agencies should not be necessary to reduce the minor impacts from SSOs, and additional costly control measures should not be imposed on suspected anthropogenic sources without a full knowledge that the measures will achieve the desired objectives. If the control measures are imposed, and the desired objectives are still not met, there is no assurance that more control measures will not be imposed in an effort to "correct" what may be a natural occurrence.

SUMMARY

As a part of the project to provide revisions to the 303(d) List, the City of Santa Maria respectfully requests that the Regional Board staff 1) remove the Blosser, Bradley, and West Main Street flood control channels from designated Surface Water Bodies; 2) more closely align actual uses of the Santa Maria River with Beneficial Uses assigned within the Basin Plan; and

3) make studied determinations of the actual sources of water impairments and the relative contributions of each source.

We appreciate your time in considering the above comments. If you have any questions or need further information, please feel free to contact Utilities Engineer Steve Kahn or me at (805) 925-0951, extension 7270.



RICHARD G. SWEET, P.E. *For*
Director of Utilities

c: Tom Fayram, Santa Barbara County Flood Control and Water Conservation District